



# GAS PIPING TECHNOLOGY COMMITTEE

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November 27, 1991

RSPA 98-4868-49


To: Main Body, Gas Piping Technology Committee

Subj: Filing of GPTC Comments Concerning Gathering  
Line Definition (Docket PS-122, Notice 1) on  
November 25, 1991

The attached comments were filed in behalf of the GPTC on the subject Docket PS-122 on November 25, 1991.

The vote was 22 approvals, no disapprovals and four abstentions from 35 Main Body members.

Sincerely,

  
Larry T. Ingels, P.E.  
Secretary, GPTC

LTI:rco  
Attachment



# GAS PIPING TECHNOLOGY COMMITTEE

November 25, 1991

Associate Administrator for Pipeline Safety  
Dockets Unit, Room 8412  
**Research** and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, DC 20590

Dear Administrator:

Subject: Comments on Notice of Proposed Rulemaking (NPRM)  
Research and Special Programs Administration (RSPA)  
Gathering Line Definition (Docket No. PS-122 Notice 1)

The Gas Piping Technology Committee (GPTC) was established pursuant to an agreement between the office of Pipeline Safety and the American Society of Mechanical Engineers (**ASME**). The GPTC was established primarily for the purpose of developing and publishing the "**Guide** for Gas Transmission and Distribution Piping" Systems (Guide), to assist the natural gas pipeline operators in the efforts to comply with 49 CFR Part 192, to comment on proposed amendments which affect Part 192, and to propose amendments to Part 192. In 1990 the administrative support of the GPTC was transferred from the **ASME** to the American Gas Association.

The Main Body of the GPTC consists of approximately 36 members, each having technical expertise in one or more of the following areas: gas distribution, transmission or gathering; piping systems design, research and construction, operation, maintenance or testing. It is a consensus based committee drawing its members from the gas transmission and distribution industries, Federal and state government regulatory agencies, material and equipment manufacturers and suppliers, contractors, independent consultants, and research agencies. The committee is in the process of obtaining approval of its operating procedures as meeting the criteria for accreditation established by the American National Standards Institute (ANSI). The formal process for accreditation under the ANSI designation of 2380 is nearing completion, including the **60-day** administrative review period for public comments.

As to the subject, the GPTC is responding to several technical issues that need to be addressed in the interest of economic reasonableness and the ultimate safety of the public.

1. Gas Gathering Pipeline End Point Determination - As stated in the proposed regulations, the order of determining the end point is: (1) the inlet of the first processing plant; (2)

custody transfer; or (3) commingling in the production field. Today's business practices involving the production and transmission of natural gas, custody transfer between the gas producers and the transporter often occurs at the well **head** or the adjacent metering facility. A possible interpretation of the proposed rules would result in reclassification of all gathering lines that do not end at a gas processing plant as being DOT jurisdictional. We do not believe this was the intent of the proposed rulemaking as stated in the preamble.

We would suggest that the DOT reconsider this specific order of end point determination and remove any inference that there is a specific order, by inserting "or\*" between (1) and (2) and the three described points. This minor change in wording would provide the operator with an option for selection of the end point in keeping with the intended function of the pipeline facility.

2. **Definition of a Processing Plant is Needed** - In addition to this end point determination, we feel that the definition of "processing plant" needs to be more specific. The preamble of the NPRM discusses both processing and treating of gas without any final definition of processing plants even though this function is used in a very important role in the proposed regulations. The proposed wording does state that:

"[A] natural gas processing plant [is] used to remove liquefied petroleum gases or other natural gas liquids" (and the NPRM preamble adds) **"from** the gas stream for **commercial** reasons."

We feel that there are high value constituents that are also removed for commercial reasons as well as for providing pipeline quality gas for domestic consumption. Some of these high value constituents are hydrogen sulfide (for sulfur production), carbon dioxide (for oil well repressuring), helium, and other commercial products. Please consider the development of a definition of "processing plants" that would differentiate between processing and treating, for the guidance of the pipeline operator.

3. **Requirements for Operation and Maintenance of Reclassified Pipelines** - The preamble for the proposed rulemaking **states** that:

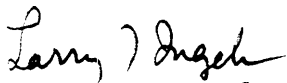
"If there are any pipelines that are reclassified as transmission pipelines, those lines would only be subject to the operating and maintenance requirements [of the DOT]..."

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Research and Special Projects Administration  
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However, nowhere in the proposed regulation wording is this provision mentioned. We submit that the proposed regulations need to be expanded by including provisions for the **"grandfathering"** of **the design, construction,** and testing for those pipelines reclassified as transmission pipelines before a certain date.

We will appreciate your consideration of our above concerns with respect to this proposed rulemaking. Please advise us if **you** desire to discuss any of these **points**.

Sincerely,

  
Larry T. Ingels, P.E.  
Secretary, GPTC

LTI:rco